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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC

This document relates to:

ALL ACTIONS

**FURTHER NOTICE REGARDING
REVISIONS TO PROPOSED ORDER
GRANTING PRELIMINARY
APPROVAL, PROPOSED NOTICE OF
CLASS ACTION SETTLEMENT,
PROPOSED CLAIM FORM, PROPOSED
LONG-FORM NOTICE, AND
PROPOSED SHORT-FORM NOTICE**

Judge: Hon. Vince Chhabria
Courtroom: 4, 17th Floor

Pursuant the Court's February 28, 2023 Order Re Preliminary Approval Hearing, ECF No. 1109, Plaintiffs propose the following revisions to the proposed claim form, proposed order granting preliminary approval, proposed long-form notice, and proposed short-form notice. Plaintiffs previously submitted revised versions of the proposed order granting preliminary approval and the proposed notice of settlement. Notice Regarding Revisions, Feb. 17, 2023, ECF No. 1106 (proposed order and proposed notice); Further Notice Regarding Revisions, Feb. 27, 2023, ECF No. 1108 (proposed order). Only new revisions based on the Order Re Preliminary Approval Hearing are discussed below.

Claim Form: The heading of Section III has been changed from "PAYMENT SELECTION" to "METHOD FOR RECEIVING PAYMENT." The "REMINDER CHECKLIST" has been updated to clarify that the Claim Form can also be submitted online. The redline of the claim form revision is attached hereto as **Appendix A**. A clean version incorporating the revision is attached hereto as **Appendix B**.

Proposed Order: Page five is revised to more clearly state that objectors may appear at the final approval hearing without submitting a written objection upon a showing of good cause and that the final approval hearing will be held via video conference. Page one is also revised to fill in a missing citation. The redline of the proposed order revisions is attached hereto as **Appendix C**. A clean version incorporating the revisions is attached hereto as **Appendix D**.

Long-Form Notice: Page seven is revised to more clearly state that class members can opt out online or by mail, and to include a link to the relevant section of the settlement website. The same page is also revised to clearly state that opt outs submitted online are only valid if the class member verifies the request to opt out using the link sent to them. Page eight is revised to more clearly state that objectors may appear at the final approval hearing without submitting a written objection upon a showing of good cause. Page nine is revised to reflect that the final approval hearing will be held over Zoom. The redline of the revisions to the long-form notice is attached hereto as **Appendix E**. A clean version incorporating the revisions is attached hereto as **Appendix F**.

Short-Form Notice: Page two is revised to reflect that the final approval hearing will be held over Zoom. The redline of the revision to the short-form notice is attached hereto as **Appendix G**. A clean version incorporating the revision is attached hereto as **Appendix H**.

In addition, the parties will be prepared to address the Court's comments regarding the inclusion of an opt out form and an objection form on the settlement website.

Dated: March 1, 2023

Respectfully submitted,

KELLER ROHRBACK L.L.P.

BLEICHMAR FONTI & AULD LLP

By: /s/ Derek W. Loeser
Derek W. Loeser

By: /s/ Lesley E. Weaver
Lesley E. Weaver

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ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(h)(3)

I, Lesley E. Weaver, attest that concurrence in the filing of this document has been obtained from the other signatory. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 1st day of March, 2023, at Oakland, California.

/s/ Lesley E. Weaver

Lesley E. Weaver